

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JULIE CHRISLEY, Individually and  
as Majority Owner of CHRISLEY  
ASSET MANAGEMENT, LLC  
and PACIFIC DEVELOPMENT  
PARTNERS, LLC,

Plaintiffs

v.

MARK BRADDOCK, LESLIE  
(HERSHBERGER) BRADDOCK,  
ALINA CLERIE, GRACE REALTY  
GROUP, LLC, KEY ASSET  
SOLUTIONS, LLC; PRIVATE  
PEERING POINT, LLC,  
WATERCOLOR RETREAT, LLC,  
KIMBERLY A. CHILDS,  
JAMES "STAGG" SHELTON,  
ARC AUTO BROKERS, LLC,  
VALENCIA WALKER, and  
STEVEN LINDSEY,

Defendants.

CIVIL ACTION FILE  
NO: 1:12-CV-03524-CAP

**DEFENDANT KIMBERLY A. CHILDS' MOTION FOR SANCTIONS**

COMES NOW, Kimberly A. Childs (hereinafter "Defendant"), a Defendant  
in the above-styled action and files this, her Motion for Sanctions pursuant to  
Federal Rule of Civil Procedure 11(c) for failure to comply with Rule 11(b).

Plaintiffs filed frivolous claims against Childs which cannot be supported by facts or evidence and which were filed for improper purposes.

In support of this Motion, Defendant Childs relies on the following:

1. Memorandum of Law in Support of the Motion for Sanctions filed contemporaneously herewith;
2. Notice of Voluntary Dismissal without Prejudice, attached as "Exhibit A";
3. November 8, 2012 Correspondence, attached as "Exhibit B";
4. E-mail correspondence dated October 12, 2012, attached as "Exhibit C"<sup>1</sup>;
5. E-mail correspondence dated October 15, 2012 (page 3 of chain), attached as "Exhibit D"; and
6. Docket Report for Childs v. Suntrust Mortgage, Inc., 1:12-cv-00407, attached as "Exhibit E."

WHEREFORE, Defendant Childs respectfully request that Defendant's Motion be GRANTED and that the Court award attorneys' fees and expenses in favor of Childs pursuant to Federal Rule of Civil Procedure (c)(4).

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<sup>1</sup> Exhibit C has been partially redacted out of an abundance of caution.

Respectfully submitted this 7th day of December, 2012.

HALL BOOTH SMITH, P.C.

/s/Crystal D. Filiberto

Rush S. Smith, Jr.

Georgia Bar No. 663362

Crystal D. Filiberto

Georgia Bar No. 383451

*Counsel for Defendant Kimberly Childs*

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a copy of the within and  
foregoing **DEFENDANT KIMBERLY A. CHILDS' MOTION FOR**  
**SANCTIONS** upon all parties to this matter via CM/ECF as follows:

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Thompson Law Group, LLC  
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1700 South Tower  
225 Peachtree Street, NE  
Atlanta, GA 30303

This 7th day of December, 2012.

HALL BOOTH SMITH, P.C.

/s/ Crystal D. Filiberto

Rush S. Smith, Jr.

Georgia Bar No. 663362

Crystal D. Filiberto

Georgia Bar No. 383451

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**CERTIFICATE OF FONT**

This is to certify that the within and foregoing pleading has been prepared  
using Times New Roman, 14 point, font which has been approved by the Court in  
L.R. 5.1C.

Respectfully submitted, this 7th day of December, 2012.

HALL BOOTH SMITH, P.C.

/s/ Crystal D. Filiberto

Georgia Bar No. 663362

Crystal D. Filiberto

Georgia Bar No. 383451

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